

FILED

**IN THE DISTRICT COURT OF THE UNITED STATES MAR 14 2008
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	CLERK U. S. DISTRICT COURT MIDDLE DIST. OF ALA.
v.		CR. NO. <u>2:08-cr-63-WKW</u>
ADLE JACKSON, a/k/a, Adella Perry, a/k/a Adella Bociurkiw, and		[18 U.S.C. § 641 18 U.S.C. § 1344 18 U.S.C. § 2]
STANLEY P. SARGENT		<u>INDICTMENT</u>
)

The Grand Jury charges:

**COUNT 1
THEFT OF GOVERNMENT PROPERTY**

1. At all times relevant to this Indictment, the defendants, **ADLE JACKSON** and **STANLEY P. SARGENT**, were residents of Montgomery, Alabama.
2. On or about September 9, 2005, an application was filed with the Federal Emergency Management Agency (“FEMA”), an agency within the United States Department of Homeland Security, for benefits in connection with Hurricane Katrina, in the name of Adle Jackson. That application falsely represented that Jackson had suffered losses to a property she rented as her primary residence in New Orleans, Louisiana. In fact, Jackson did not reside in Louisiana and did not suffer the losses claimed.
3. FEMA accepted the application and caused a United States Treasury check in the amount of \$2,000 to be electronically deposited into Jackson and Sargent’s joint checking account with AmSouth Bank. Jackson and Sargent then used the \$2,000 to purchase goods and services.
4. On or about the date set forth below, in Montgomery County, within the Middle District of Alabama, and elsewhere, the defendants,

**ADLE JACKSON and
STANLEY P. SARGENT,**

did, while aiding and abetting each other and while being aided and abetted by each other and by other persons both known and unknown to the Grand Jury, embezzle, steal, purloin, and knowingly convert to her and his own use money and things of value of the United States and of a department and agency thereof, in an amount in excess of \$1,000, and did receive, conceal, and retain the same with the intent to convert it to her and his use and gain, knowing it to have been embezzled, stolen, purloined and converted as described below:

COUNT	DATE	ITEM
1	September 12, 2005	FEMA disaster assistance funds in the amount of \$2,000.

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNT 2 – BANK FRAUD

5. The allegations set forth in paragraphs 1 through 4 of this Indictment are hereby realleged as if set forth herein.

6. At all times relevant to this Indictment, Chase Bank USA, N.A., was a financial institution as defined in Title 18, United States Code, Section 20.

7. From on or about July 10, 2005, and continuing until on or about September 19, 2005, in Montgomery County, Alabama, in the Middle District of Alabama and elsewhere, the defendant,

STANLEY P. SARGENT,

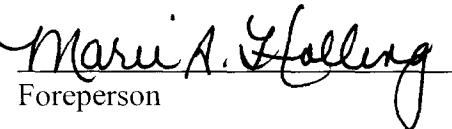
did, while aiding and abetting other persons both known and unknown to the Grand Jury and while being aided and abetted by the same, knowingly and willfully executed and attempted to execute a scheme to obtain the moneys, funds, assets, and other property owned by, and under the custody and

control of a financial institution, namely Chase Bank, USA, N.A., a bank whose deposits were then insured by the Federal Deposit Insurance Corporation by means of false and fraudulent pretenses and representations.

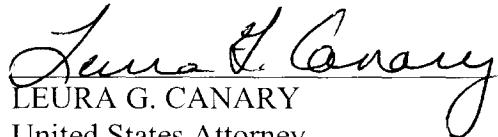
8. As part of the scheme, on or about July 10, 2005, Sargent wrote a convenience check, drawn on Chase Bank USA, N.A., in the amount of \$13,824.07 payable to Sargent's to American Express account. Some time after his check was debited to his account on or about July 13, 2005, Sargent then claimed that the check was a fraudulent and unauthorized transaction. As part of the scheme, on or about September 19, 2005, Sargent signed an affirmation in which he claimed that the use of this check was unauthorized by him.

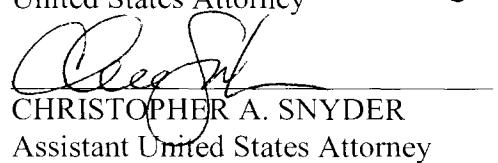
All in violation of Title 18, United States Code, Section 1344 and 2.

A TRUE BILL:



Foreperson


LEURA G. CANARY
United States Attorney



CHRISTOPHER A. SNYDER
Assistant United States Attorney